

STATEMENT OF BASIS (AI No. 52386)

for draft Louisiana Pollutant Discharge Elimination System permit No. **LA0109495** to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Wadleigh Industries, Inc.
Offshore Equipment Solutions
Post Office Box 188
Slidell, LA 70459

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Lisa Kemp

DATE PREPARED: December 10, 2009

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit revocation and reissuance of a current Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term. Wadleigh Industries, Inc. is requesting the revocation and reissuance of LPDES permit number LA0109495 for the purpose of adding two new outfalls due to an expansion of their Offshore Equipment Solutions facility. Operations at the facility will remain the same. The applicant has also requested that Outfall 001, the discharge of uncontaminated stormwater runoff and previously monitored sanitary wastewater (Outfall 101) and equipment washwater (Outfall 201) from the retention pond be included in the permit reissuance. This outfall was deleted in the previous permit because stormwater runoff is covered by Stormwater Pollution Prevention Plan requirements.

The Offshore Equipment Solutions facility is currently authorized to discharge treated sanitary wastewater and equipment washwater via unnamed conveyances to Bayou Vincent in accordance with LPDES permit number LA0109495. Industrial stormwater runoff is covered by the Stormwater Pollution Prevention Plan requirements contained in the Narrative Requirements of the permit.

According to the application, Wadleigh Industries, Inc.'s Offshore Equipment Solutions facility proposes to discharge treated sanitary wastewater and equipment washwater from a new building to local drainage thence Bayou Vincent.

B. LPDES permit –

LPDES permit effective date: October 1, 2005
LPDES permit expiration date: September 30, 2010
EPA has not retained enforcement authority.

C. Date Application Received: November 16, 2009

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2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - crane repair facility

This is an existing facility which repairs cranes and winches used in offshore oil operations. Fabricating, painting, sandblasting, and washdown of cranes, winches, and crane components are done onsite.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II*
3. Wastewater Type: II
4. SIC code: 3536, 3599, 1389

* The points for this facility have been BPJ'd to 3 because of the low volume of wastewater being discharged.

C. LOCATION - 37015 Brown's Village Road, in Slidell, St. Tammany Parish (Latitude 30° 18' 50", Longitude 89° 47' 17")

3. OUTFALL INFORMATION

Note: This outfall was deleted in the current permit because stormwater runoff is covered by Stormwater Pollution Prevention Plan requirements. However, the permittee has requested that this outfall be included in the permit reissuance.

Outfall 001

Discharge Type:	stormwater runoff and previously monitored effluent from Outfalls 101 and 201
Treatment:	retention pond
Location:	at the point of discharge from the retention pond prior to combining with other waters
Flow:	intermittent
Discharge Route:	local drainage to Bayou Vincent

Outfall 101

Discharge Type:	treated sanitary wastewater
Treatment:	aerated mechanical sewage treatment plant with chlorination
Location:	at the point of discharge from the sewage treatment plant prior to combining with other waters
Flow:	500 gpd
Discharge Route:	retention pond to local drainage; thence to Bayou Vincent

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Outfall 201

Discharge Type: equipment washwater
 Treatment: oil/water separator
 Location: at the point of discharge from the oil/water separator prior to
 combining with other waters
 Flow: 200 gpd
 Discharge Route: retention pond to local drainage; thence to Bayou Vincent

Note: Application outfalls 301 and 401 have been renumbered since these outfalls discharge directly to the ditch and are not internal to Outfall 001.

Outfall 002 (application Outfall 301) -----

Discharge Type: treated sanitary wastewater from the new building
 Treatment: aerated mechanical sewage treatment plant with chlorination
 Location: at the point of discharge from the sewage treatment plant prior to
 combining with other waters
 Flow: 500 gpd
 Discharge Route: local drainage to Bayou Vincent

Outfall 003 (application Outfall 401)

Discharge Type: equipment washwater from the new building
 Treatment: oil/water separator
 Location: at the point of discharge from the oil/water separator prior to
 combining with other waters
 Flow: 200 gpd
 Discharge Route: local drainage to Bayou Vincent

4. RECEIVING WATERS

STREAM - Bayou Bonfouca headwaters to LA. Hwy. 433

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 040907

DESIGNATED USES - a. primary contact recreation
 b. secondary contact recreation
 c. propagation of fish and wildlife

5. TMDL STATUS

Subsegment 040907, ditch to Bayou Vincent, is listed on LDEQ's Final 2006 303(d) List as impaired for organic enrichment/low DO, chlorides, and sulfates. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the crane repair facility point source

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category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. Chlorides and sulfates are listed as drought-related impacts. A BOD₅ limitation placed on the sanitary discharges and a COD limitation placed on the washwater discharges will address dissolved oxygen concerns.

6. CHANGES FROM PREVIOUS PERMIT

1. Outfall 001 has been included in the permit per applicant request.
2. Outfall 101 - Monthly average effluent limitations for BOD, TSS, and Fecal Coliform and monthly average flow reporting have been established at Outfall 101. Weekly Average limitations for BOD₅, TSS, and Fecal Coliform are now Daily Maximum. These changes have been made in accordance with current guidance for similar discharges. pH will now be monitored at final Outfall 001.
3. Outfall 201 - Oil and Grease and pH will now be monitored at final Outfall 001.
4. Outfall 002 has been added for the discharge of treated sanitary wastewater from the new building.
5. Outfall 003 has been added for the discharge of equipment washwater from the new building.

7. COMPLIANCE HISTORY/COMMENTS

- A. OEC - There are no open, appealed, or pending OEC enforcement actions as of December 2, 2009.
- B. DMR Review - A review of DMRs submitted from June, 2007 through June, 2009 revealed that the facility has been following their old permit. They have been sampling Outfall 101 (sewage treatment plant) every six months instead of quarterly as required by the current permit. In addition, DMRs report no samples taken at Outfall 101 from February, 2008 to December, 2008. Oil and grease and pH samples for Outfall 201 (equipment washwater) were being collected at the discharge from the retention pond instead of at the point of discharge from the oil/water separator as required by the current permit. Sampling of the outfalls was corrected in April, 2009 in response to the March, 2009 inspection and a notice of corrected deficiency was issued to the facility (see Inspection, below). The following samples reported results above permit limitations:

Date	Parameter	Outfall	Reported Value	Permit Limits
April, 2009	Oil and Grease	201	22.9 mg/L (daily max)	15 mg/L (daily max)
Jan., 2009	Fecal Coliform	101	21,000 col/100 ml*	400 col/100 ml
Jan., 2008	TSS	101	249 mg/L	45 mg/L
Oct., 2007	pH	201	5.6 (min)	6.0 (min)

* Fecal coliform was resampled in March, 2009. The result was 63 col/100ml.

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C. Inspection – An inspection performed at the facility on March 26, 2009 (EDMS document # 41312755) revealed the following:

1. The facility is still following the old permit. They are sampling the sanitary outfall every six months instead of quarterly as stated in the current permit. Outfall 001(stormwater runoff, previously monitored sanitary wastewater, and previously monitored equipment washwater) was deleted in the current permit, however it is still being sampled quarterly. Samples for oil and grease and pH for Outfall 201 (oil/water separator) were being collected at the discharge point of the retention pond into local drainage instead of at the oil/water separator prior to combining with other waters as required by the current permit.
2. The Stormwater Pollution Prevention Plan submitted March 5, 2002 was prepared by Acculab. The Plan does not address the changes that were issued with the current permit. The Plan must also address sediment runoff from the new construction site.

April 3, 2009 – The inspector met with Mr. Barker of Offshore Equipment Solutions. All compliance issues had been corrected and a notice of corrected deficiency was issued to the facility on April 20, 2009.

8. EXISTING EFFLUENT LIMITS

Outfall 101 – treated sanitary wastewater

Pollutant	Limitation		Frequency
	Monthly Avg	Weekly Average	
	mg/L (unless stated)		
Flow	---	Report	quarterly
BOD ₅	---	45	quarterly
TSS	---	45	quarterly
Fecal Coliform colonies/100ml	---	400	quarterly
pH, s.u.	6.0 (min)	9.0 (max)	quarterly

Outfall 201 – equipment washwater

Pollutant	Limitation		Frequency
	Monthly Avg	Daily Max	
	mg/L (unless stated)		
Flow	Report	Report	quarterly
COD	200	300	quarterly
TSS	---	45	quarterly
Oil & Grease	---	15	quarterly
Soaps & Detergents	Inventory Record	---	quarterly

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Oil & Grease, Visual	---	No Presence	daily
pH, s.u.	6.0 (min)	9.0 (max)	quarterly

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040907 of the Lake Pontchartrain Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Wadleigh Industries, Inc./Offshore Equipment Solutions

1. **Outfall 001** – stormwater runoff and previously monitored effluent from Outfalls 101 and 201 (flow is intermittent)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	Mg/L (unless stated)		
Flow - gpd	Report	Report	LAC 33:IX.2707.1.1.b
TOC	---	50	LDEQ stormwater guidance *
Oil & Grease	---	15	LDEQ stormwater guidance *
pH, standard units	6.0 (min)	9.0 (max)	LDEQ stormwater guidance *

Treatment: retention pond

Monitoring Frequency: quarterly for all parameters at the point of discharge from the retention pond

Limits Justification: limits and monitoring frequency are based on current guidance for similar discharges from other industrial facilities and LDEQ stormwater guidance*.

* LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

2. **Outfall 101** - treated sanitary wastewater (estimated flow is 500 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L (unless stated)		
Flow	Report	Report	
BOD ₅	30	45	Similar discharges* (BPJ), LAG530000
TSS	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform colonies/100ml	200	400	Similar discharges* (BPJ), LAG530000

Treatment: mechanical treatment plant with chlorination

Monitoring Frequency: quarterly for all parameters at the point of discharge from the STP prior to mixing with other waters. Monitoring frequency is based on the previous permit.

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Limits Justification: Limits are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General Permit, LAG530000 effective December 1, 2007.

3. **Outfall 201** – equipment washwater (estimated flow is 200 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L (unless stated)		
Flow	Report	Report	
COD	200	300	Similar discharges*, LAG480000 (BPJ)
TSS	---	45	Similar discharges*, LAG480000 (BPJ)
Soaps & Detergents	Inventory Record	---	Similar discharges*, LAG480000 (BPJ)
Oil & Grease, Visual	---	No Presence	Similar discharges*, LAG480000 (BPJ)

Treatment: oil/water separator

Monitoring Frequency: daily for Oil and Grease, Visual and quarterly for flow, TSS, and COD at the point of discharge from the oil/water separator prior to mixing with other waters. Soaps and Detergents: document in a quarterly inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities and the Light Commercial General Permit, LAG480000 effective August 1, 2001. Oil and grease shall be measured at the final outfall, Outfall 001.

4. **Outfall 002** - treated sanitary wastewater from the new building (estimated flow is 500 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L (unless stated)		
Flow	Report	Report	
BOD ₅	30	45	Similar discharges* (BPJ), LAG530000
TSS	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform colonies/100ml	200	400	Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG530000

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Treatment: mechanical treatment plant with chlorination

Monitoring Frequency: semiannually for all parameters at the point of discharge from the STP prior to mixing with other waters.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General Permit, LAG530000 effective December 1, 2007.

5. **Outfall 003** – equipment washwater from the new building (estimated flow is 200 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L (unless stated)		
Flow	Report	Report	
COD	200	300	Similar discharges*, LAG480000 (BPJ)
TSS	---	45	Similar discharges*, LAG480000 (BPJ)
Oil & Grease	---	15	Similar discharges*, LAG480000 (BPJ)
Soaps & Detergents	Inventory Record	---	Similar discharges*, LAG480000 (BPJ)
Oil & Grease, Visual	---	No Presence	Similar discharges*, LAG480000 (BPJ)
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges*, LAG480000 (BPJ)

Treatment: oil/water separator

Monitoring Frequency: daily for Oil and Grease, Visual and quarterly for flow, TSS, COD, oil and grease, and pH at the point of discharge from the oil/water separator prior to mixing with other waters. Soaps and Detergents: document in a quarterly inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

Note: EPA Guidelines for Metal Products & Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements for exterior equipment washwater are being placed in the permit.

* Existing permits for similar outfalls

BPJ Best Professional Judgement
su Standard Units

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NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC codes 3536, 3599, and 1389 are considered to have storm water discharges associated with industrial activity.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).

ADDITIONAL INFORMATION

Notification of Monitoring Frequency Reduction

Please be aware that the Department has the authority to reduce monitoring frequencies when a permittee demonstrates two or more consecutive years of permit compliance. Monitoring frequencies established in LPDES permits are based on a number of factors, including but not limited to, the size of the discharge, the type of wastewater being discharged, the specific operations at the facility, past compliance history, similar facilities and best professional judgment of the reviewer. We encourage and invite each permittee to institute positive measures to ensure continued compliance with the LPDES permit, thereby qualifying for reduced monitoring frequencies upon permit reissuance. If the Department can be of any assistance in this area, please do not hesitate to contact us. As a reminder, the Department will also consider an increase in monitoring frequency upon permit reissuance when the permittee demonstrates continued non-compliance.